

National Aeronautics and Space Administration  
Headquarters  
Washington, DC 20546-0001



September 13, 2007

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance at the NASA Lecture Series Luncheon and Lecture on September 17, 2007

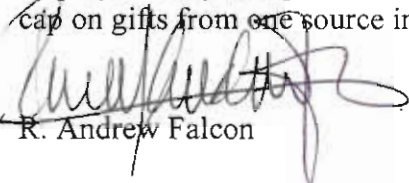
On September 17, 2007, NASA and Lockheed Martin will host and sponsor a luncheon and lecture at The Chinese Room in the Renaissance Mayflower Hotel in Washington, DC at 12:30 p.m.

The luncheon will be attended by representatives of the aerospace industry, trade associations, congressional staffers, Congress, and other Federal agencies. Approximately 600 people have been invited expected to attend. The estimated cost of the luncheon, which includes all food and beverages, is \$20 per person. I find that this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Dr. Michael Griffin, NASA Administrator, will be the guest speaker. He will speak on "The Space Economy" and discuss the full range of activities and resources that create and provide value and benefits to human beings in the course of exploring, understanding, and utilizing space.

Attendance at the luncheon will allow NASA representatives to discuss the Vision for Space Exploration and NASA programs with the other attendees. Accordingly, NASA employees whose duties do not substantially affect Lockheed Martin may accept an invitation for free attendance to the reception for themselves. NASA employees whose duties may substantially affect Lockheed Martin, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.205(g)(3)(i) regarding participation in this event from their local ethics counselor.

In addition, Lockheed Martin may give each attendee an small spiral notebook and pen valued at approximately \$5. Attendees are reminded of the \$20 gift exception at 5 C.F.R. § 2635.204(a) which provides that employees may accept gifts valued at no more than \$20 per occasion. Accordingly, in addition to accepting free attendance at the event, NASA employees may accept these mementos. NASA invitees are reminded not to exceed the \$50 cap on gifts from one source in a calendar year.

  
R. Andrew Falcon